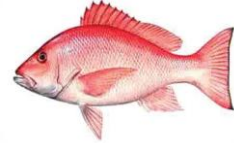
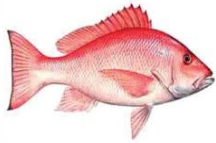


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

August 18, 2014

Mr. Bob Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Email comments to: Mike.Collins@safmc.net
(Please put SG RA 20 in the subject line)

Re: Snapper Grouper Regulatory Amendment 20 Snowy Grouper

Mr. Mahood,

The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) regarding the proposed Snapper Grouper (SG) Regulatory Amendment 20 (RA-20) with respect to the Atlantic Snowy grouper stock.

We have several concerns about the results of the final Southeastern Data, Assessment and Review (SEDAR 36) stock assessment report (SAR) which are utilized in the SG RA-20 proposed rule making process for Atlantic Snowy grouper. Specifically, we concur with the findings of the SEDAR 36 SAR that this fish stock is currently "underfished," but we believe that the "rebuilding" estimates for this stock are conservative, and even more access to this fish stock is a reasonable option, at this time.

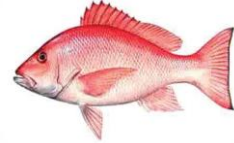
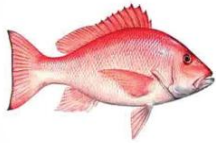
The specific problems with stock projections and alternative management options need to be **resolved before the SFA ECFS can comment on preferred management options and alternatives affecting the SAFMC commercial and recreational fisheries**. In summary, the Council should refrain from selecting management options until the allocation issue, as described below, has been resolved.

- The MRFSS/MRIP estimates by year are very unreliable¹. In particular there is the need to examine years without samples or have extreme estimated landing numbers that are suspect due to low sample size by region. See Wave 3 during

¹ http://www.sefsc.noaa.gov/sedar/download/SEDAR36_WP01_Matter_8.16.2013.pdf?id=DOCUMENT

See Tables in the working paper hyperlinked here demonstrating the issues with zero samples, zero intercepts, and massive expansions on minimal samples and/or intercepts from various regions in the SAFMC area

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



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May/June 2012, as compared to Wave 3 during 2013 in Tables S-8 and S-9². We truly question the veracity of the 83% commercial and 17% recreational results leading to a reallocation being utilized in this SAFMC SG RA-20 proposed rule! We feel this is wrong and needs remedy.

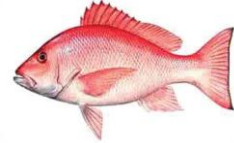
- The recent SEDAR 36 Standard Assessment process was held with no physical meetings, even though it had been a decade since the previous SEDAR 04 snowy grouper assessment full benchmark. The Snowy grouper and Blueline Tilefish should have (and can still be) assessed, as a “deep-water complex”, at the same SEDAR event, with physical meetings to truly examine the veracity of data supporting the indices of abundance used by the SEDAR 36 analysts, and to question their assumptions about the uncertainties of the fishing history. Also, see the addendum with the Barile and Oden written comment about SEDAR 36³, along with the SFA ECFS comment to the SAFMC Scientific and Statistical Committee (SSC) [though public record of our written comment was not included in the SSC April 2014 Briefing Book (BB), or the final report, nor was found in the June 2014 SAFMC BB. ***The SEDAR 36 standard stock assessment for South Atlantic snowy grouper indicated that the stock is still “overfished” but is currently not undergoing “overfishing” with respect to benchmarks produced in SEDAR 4 to achieve rebuilding of the stock. With updated modifications of both data and the model, where more accurate estimates of steepness and natural mortality were included, the SEDAR 36 model suggests a lower SSB_{msy} to achieve the rebuilding of the stock, and that increased sustainable fishing rates (F_{msy}) and production (MSY) can be achieved during this rebuilding plan. It is clear, with strong statistical certainty of ~ 76%, that snowy grouper is not undergoing “overfishing” and that fishing rate (F/F_{msy}) is significantly under the sustainable (F_{msy}) fishing rate that is permissible under the “rebuilding plan” targets for B_{msy} and SSB_{msy}. Specifically, **fishing removal rate is only 59% of the possible rate that still maintains the rebuilding trajectories to achieve “not overfished” status (i.e. SSB/SSB_{msy} and B/B_{msy} are = 1).*****
- The SAFMC failed to nominate a commercial fishing interest to participate in the SEDAR 36 webinar process during December 2012, yet they chose two recreational fishing representatives to the panel. Then as a reaction to complaints later after the SEDAR 36 webinars had begun, a single commercial

²See PDF page 21 of 22 pages for Tables S-8 & S-9 at hyperlink below.

http://safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/Aug%202014/SGReg20_P_HSummary_Aug2014.pdf

³http://www.sefsc.noaa.gov/sedar/download/SEDAR36_WP13_PublicComments_10.1.2013.pdf?id=DOCUMENT
Includes Jeff Oden comment received on July 23, 2013 and Oden & Barile public comment received September 13, 2013.

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

fisherman from North Carolina named Captain Jeff Oden was picked by the SAFMC June 2013 meeting⁴ to serve as a SEDAR 36 commercial representative during the assessment webinars, in spite of 95% of the allocations had been historically assigned. Due to conflicts of scheduling after Captain Oden's appointment, he could not attend all of the webinars.

- The SFA ECFS Central Florida fish houses feel that Action 3 for Commercial Management Measures for Snowy Grouper, in particular Alternative 5 as currently written, causes severe economic and social concerns about the Brevard/Volusia County, Florida line being chosen for the period May to August for future fishing seasons as an alternative. The Alternative 5 should be **reworded** to move the southern management boundary to the **Brevard/Indian River County**, Florida line near Sebastian Inlet, instead. Setting the management boundary line at Brevard/ Indian River Co. would then include Cape Canaveral as an important biogeographical portion of the historic Snowy Grouper fishery in this management action. Based on the distance from Sebastian Inlet to the snowy grouper fishing grounds out to 650 feet, it requires 35 miles⁵ minimum one-way to the deeper depths where the larger snowy grouper have populations separate from the inshore juvenile and young to medium sized female adult snowy groupers found predominately in 200 to 360 feet of water depth. Offshore of New Smyrna just north of the Brevard/Volusia County, FL line it is 52-miles to 650-feet of depth. With a ten-mile an hour commercial vessel it takes most of the day of traveling round trip to catch the current trip limit, usually in one to three multi-hook drops with the hook and line fishing gear. The catch per unit of effort (CPUE) has increased over recent years for commercial fishing for snowy groupers, as has the average sizes, far in advance of the 6 to 7 pounds whole weight (ww) referenced in Table S-2⁶.
- Our fishermen prefer a 300 pounds (gw) trip quota to support access to this historically utilized deep-water fishery stock.

Jimmy Hull, Chairman
SFA ECFS

⁴ See June 2013 Council minutes on PDF page 25 of 113 pages for Jeff Oden motion as a SEDAR 36 Panelist.
<http://www.safmc.net/meetings/pdf/FullCouncilMinJun13.pdf>

⁵ See Table S-7 in the Snapper Grouper Regulatory Amendment 20 for distances from various inlets from NC to FL on PDF pages 18-19 of 22
http://safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/Aug%202014/SGReg20_P_HSummary_Aug2014.pdf

⁶ See Table S-2 on PDF page 11 of 22 from hyperlink in Footnote 3 above